



Pete Solnick <pete@solnicklaw.com>

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## documents

1 message

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**Pete Solnick** <pete@solnicklaw.com>

Fri, Nov 17, 2023 at 1:48 PM

To: "Bennett, Allyson R." <ABennett@mofo.com>, "Gratz, Joseph C." <JGratz@mofo.com>, "DeStefano, Michael J" <mdestefano@mofo.com>

Would you please produce all the documents you agreed to produce ? I obviously am honoring the protective order. I also would like a date for Amazon's corp rep's deposition.  
I would like the person most knowledgeable about the following areas:

- 1) the paid search marketing efforts involving the terms NeuroMD and/or NeuroMed.
- 2) the organic search involving the terms NeuroMd and/or Neuromed.
- 3) the keyword advertisement(s) using the terms NeuroMD and/or Neuromed in the different internet browsers.
- 4) the number of impressions Amazon obtained from the terms NeuroMD and/or Neuromed,
- 5) the sales generated from use of the terms NeuroMD and/or Neuromed in a sponsored link, keyword advertisement, and/or organic search.
- 6) the information and/or meta data Amazon provided to the various search engines involving the paid search advertising or organic search of the terms NeuroMD and/or Neuromed.
- 7) the blocking of the terms NeuroMD and/or Neuromed from the various search engines.

I would appreciate it if we could take the deposition in December.  
It can be via zoom if you would like.

Thank you.  
Pete

**Peter J. Solnick, Esq.**

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**Kindly note our change in address. We are now at our NEW OFFICE LOCATION located at [3363 NE 163rd Street, Suite 801, North Miami Beach, FL 33160](#)**

**If visiting, free parking is available on the 3rd and 4th floor.**